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**BellSouth Interconnection Services**

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July 21, 2003

Ms. Denise Berger  
AT&T Operations – Assistant Vice President  
1200 Peachtree Street NE  
Room 12256  
Atlanta, GA 30309

Dear Denise:

This is a follow up to telephone conversations and e-mails between BellSouth and AT&T concerning AT&T's use of Secondary Access Customer Terminal Locations (ACTLs) to Collocation sites. The Secondary ACTL process AT&T is currently utilizing requires manual processing in order for the service order(s) to flow through BellSouth's systems. The Federal Communications Commission (FCC) has issued a mandate that requires BellSouth to utilize an automated ordering process. For this reason, BellSouth has no plans to continue accepting service orders that require manual processing. AT&T has indicated there are nine (9) "FIM" Access Customer Name Abbreviation (ACNA) sites and an additional 15 "ATX" ACNA sites where a Secondary ACTL arrangement is needed.

BellSouth has previously recommended the following options to accommodate AT&T service orders while simultaneously meeting the mandated automated service order standards:

- **Use of a Single ACTL/ACNA at each Collocation Site**

The specific root cause of this problem is AT&T's service requests that contain an ACNA in conflict with the ACNA of the collocation arrangement identified on the service order. AT&T should be aware that industry standards established by the National Exchange Carrier Association (NECA) and Telcordia subscribe to the premise of utilizing all codes consistently. Thus the option shown below:

Use the "Transfer of Ownership" process to convert sites to one ACNA. This option eliminates the need to process orders for more than one ACNA at each site.

- **Accept the New Business Request (NBR) Option offered to convert BellSouth Databases to allow "Dual" ACNA Orders to flow through the BellSouth systems**

In 2001, BellSouth worked with AT&T to develop a NBR for mechanization. This mechanization upgrade (involving 86 systems) would allow multiple ACNA orders to flow through BellSouth's systems without manual intervention.

Unfortunately, AT&T has rejected both of these options while requesting that BellSouth continue to manually process these service orders. Due to the FCC mandate and because of the costs of manually processing a service order, AT&T's request is unacceptable to BellSouth. In an effort to resolve this issue, BellSouth has continued to research additional options that would provide an "Order Flow Through".

The following proposal is an arrangement contained in the AT&T Interconnection Agreement that meets industry standards and allows valid service orders to flow through without manual intervention. BellSouth recommends the existing Secondary ACTL sites, additional 9 FIM sites, and 15 ATX sites use the following option to accomplish the Secondary ACTL requirement:

- **Use the 'Guest/Host' Collocation Arrangement to Establish a Guest Presence**

Under this Collocation arrangement, each Host/Guest ACNA has unique ACTL and Connecting Facility Assignments (CFA) in the cage. The Host places a Collocation Augment Application, pursuant to its Interconnection Agreement, and submits a Letter of Authorization for the new entity (Guest). With the Guest/Host arrangement, a 30-day freeze would not be required provided applications are placed for new CFA facilities. The freeze would apply if existing CFAs were converted to a new ACNA. In addition, service order charges would apply to any services terminating in the collocation site involved in the change.

Estimated costs to convert or add CFAs were previously provided for the ATX FTLDFLCY Collocation Site. (See Attachment.) The Guest/Host arrangement would allow orders to flow through without manual intervention since each ACNA would have a CFA and ACTL assigned in the collocation cage.

Please refer to AT&T's Interconnection Agreement or contact your Regional Collocation Manager for additional information about the Guest/Host Collocation Arrangement.

AT&T has indicated it was taking steps to resolve the need for multiple ACNA orders. Please advise BellSouth of the option AT&T prefers, thus eliminating the need for manual intervention on future service orders.

Should additional information be needed, please feel free to contact me at 205 321-4700.

Yours Truly,

ORIGINAL SIGNED BY JIM SCHENK

Attachment

Estimate of charges to add Guest facilities (Florida Contract)						
Type Charge per contract	USOC	Description	Quantity	Charge per Unit	Total for item	
Subsequent Application Fee	PEICA	NRC	1	\$2,236.00	\$2,236.00	
Cable Records fee per request	PEICR	NRC	1	\$980.22	\$980.22	
VGDS0 per application	PEICD	NRC	1	\$656.50	\$656.50	
VGDS0 per 100 pair	PEIC0	NRC	3425	\$9.66 per 100 pair	\$330.86	
DS1 PER TITIE	PEIC1	NRC	280	4.52 per TITIE	\$1,265.60	
DS3 per T3TIE	PEIC3	NRC	48	15.82	\$759.36	
Total estimate of augment w/cable records					\$6,228.54	